

**RECEIVED**  
**Sep 15 2022**  
**SC Court of Appeals**

THE STATE OF SOUTH CAROLINA  
In The Court of Appeals

APPEAL FROM ORANGEBURG COUNTY  
Court of Common Pleas

James B. Jackson, Jr., Master-in-Equity

Appellate Case No. 2022-001147

U.S. Bank National Association, as Trustee, as successor to U.S. Bank Trust National Association, as Trustee, for Conseco Finance Home Equity Loan Trust 2001-C,.....Respondent,

v.

Frances L. Mack nka Frances L. Mack-Marion,.....Appellant.

MOTION TO EXTEND DEADLINE TO SERVE AND FILE INITIAL BRIEF  
AND DESIGNATION OF MATTER  
TO BE INCLUDED IN RECORD ON APPEAL

Appellant hereby moves pursuant to Rule 263(b), SCACR, for a 30-day extension of the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal. The grounds for this motion are that there is good cause to grant the requested extension, as the following shows:

1. The subject deadline is presently today, September 15, and Appellant's counsel has not yet completed the initial brief. Appellant's counsel's law partner died Friday, and dealing with matters associated with his death has taken time that might have been used to complete the brief.

2. Accordingly, an extension is needed.
3. This is the first extension sought of this deadline.
4. There is good cause for the requested extension.
5. The undersigned has served this document on opposing counsel by email to registered AIS email address on the date given below.

WHEREFORE Appellant prays for an order extending the time in which to serve and file the Appellant's initial brief and designation of matter to be included in the record on appeal by 30 days.

Respectfully submitted,

/s/ Andrew S. Radeker  
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Sarah M. Larabee  
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Attorneys for Appellant

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Frances L. Mack nka Frances L. Mack-Marion,.....Appellant.

PROOF OF SERVICE

I certify that I have served the foregoing motion for extension on the date given below by emailing it to counsel for the Respondent at the address(es) noted below.

Damon C. Wlodarczyk, Esq., at [damonw@rplfirm.com](mailto:damonw@rplfirm.com)

Respectfully submitted,

/s/ Andrew S. Radeker

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September 15, 2022